UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MASSACHUSETTS . 765 JM -7 P 3 4!

SCOTT L. BAENA, Litigation Trustee of the Lernout & Hauspie Speech Products, N.V. Litigation Trust,

CIVIL ACTION NO.: 04-CV-12606 (PBS

Plaintiff

v.

KPMG LLP and KLYNVELD PEAT MARWICK GOERDELER BEDRIJFSREVISOREN,

Defendants

MOTION FOR LEAVE TO ADMIT GEORGE A. SALTER AND NICHOLAS W.C. CORSON PRO HAC VICE

In accordance with Rule 83.5.3(b), Michael J. Stone, a member of the bar of Massachusetts, respectfully moves for the admission pro hac vice of George A. Salter, John A. Redmon and Nicholas W.C. Corson of the Law Firm of Hogan & Hartson, LLP, 875 Third Avenue, New York, New York 10022, (212)685-8000 to appear and practice in this Court for this case as co-counsel for defendant KPMG-B. As detailed in the Affidavits of Mr. Salter and Mr. Corson (attached hereto as Exhibits A and B) both are members of the bar in good standing in every jurisdiction in which he has been admitted to practice. There are no disciplinary proceedings pending against either of them as a member of the bar in any jurisdiction, and both are familiar with the local rules of the United States District Court for the District of Massachusetts. Payment of the \$50.00 admission fee per attorney has been submitted to the Clerk of the Court. I have previously entered my appearance as counsel for the defendant, KPMG-B.

WHEREFORE, Michael J. Stone, Esq., hereby respectfully requests that the Court grant this Motion for Leave to Admit George A. Salter and Nicholas W.C. Corson pro hac vice.

Respectfully submitted,

Michael J. Stone, Esq., BBO No. 482060

PEABODY & ARNOLD, LLP

30 Rowes Wharf Boston, MA 02110 (617) 951-2100

Dated: January ______, 2005

CERTIFICATE OF SERVICE

I hereby certify that on this _____ day of January, 2005, I caused copies of the above motion to be served via U.S. first class mail, postage prepaid on the attorney of record for each party on the attached Service List.

Michael J. Stone

PABOS2:MSTONE:605203_1 14849-90755

SERVICE LIST

Lisa L. Coggins, Esq. Theodore J. Tacconelli, Esq. Ferry, Joseph, Pearce, P.A. 824 Market Street, Suite 904 Wilmington, DE 19801 Brett Fallon, Esq.
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UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MASSACHUSETTS

SCOTT L. BAENA, Litigation Trustee of the Lernout & Hauspie Speech Products, N.V. Litigation Trust,

CIVIL ACTION NO.: 04-CV-12606 (PBS)

Plaintiff

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KPMG LLP and KLYNVELD PEAT MARWICK GOERDELER BEDRIJFSREVISOREN,

Defendants

AFFIDAVIT OF GEORGE A. SALTER, ESQUIRE

I, George A. Salter, Esquire, hereby state the following:

- 1. I am an attorney licensed to practice law in the State of New York.
- I am a member in good standing in the bar of the State of New York and there are no disciplinary proceedings pending against me as a member of the bar in any jurisdiction.
- 3. I am an attorney in the law firm of Hogan & Hartson, LLP, 875 Third Avenue, New York, NY 10022.
- 4. I am familiar with the local rules of the United States District Court for the District of Massachusetts.

WHEREFORE, I respectfully request that the motion to allow me to be admitted <u>pro hac</u> vice for the purposes of this case be allowed.

SIGNED UNDER THE PENALTIES OF PERJURY THIS _____ DAY OF JANUARY, 2004.

George A. Salter, Esq.

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UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MASSACHUSETTS

SCOTT L. BAENA, Litigation Trustee of the Lernout & Hauspie Speech Products, N.V. Litigation Trust,

CIVIL ACTION NO.: 04-CV-12606 (PBS)

Plaintiff

v.

KPMG LLP and KLYNVELD PEAT MARWICK GOERDELER BEDRIJFSREVISOREN,

Defendants

AFFIDAVIT OF NICHOLAS W.C. CORSON, ESQUIRE

I, Nicholas W.C. Corson, Esquire, hereby state the following:

- 1. I am an attorney licensed to practice law in the State of New York.
- 2. I am a member in good standing in the bars of this jurisdiction and there are no disciplinary proceedings pending against me as a member of the bar in any jurisdiction.
- 3. I am an attorney in the law firm of Hogan & Hartson, LLP, 875 Third Avenue, New York, NY 10022.
- 4. I am familiar with the local rules of the United States District Court for the District of Massachusetts.

WHEREFORE, I respectfully request that the motion to allow me to be admitted <u>pro hac</u> <u>vice</u> for the purposes of this case be allowed.

SIGNED UNDER THE PENALTIES OF PERJURY THIS 6th DAY OF January, 2004.

Nicholas W.C. Corson, Esq.

PABOS2:MSTONE:605205_1 14849-90755